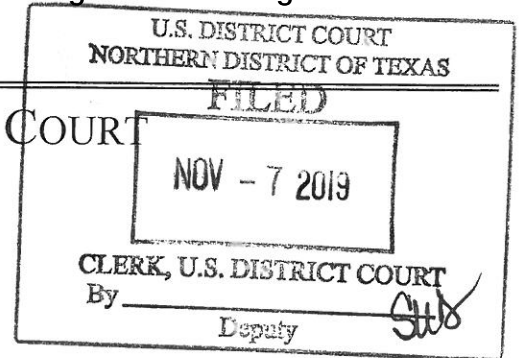


AO 91 (Rev. 11/11) Criminal Complaint

SEALED

UNITED STATES DISTRICT COURT
for the
Northern District of Texas



United States of America

v.

CURTIS MATHIS

Case No.

3:19-MJ-

3-19MJ1009BT*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 4-5, 2019 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*18 U.S.C. §§ 1591(a) and (b)(1)(b)
(2)

Child Sex Trafficking

This criminal complaint is based on these facts:

See attached Affidavit of SA Michael Pederson.

☒ Continued on the attached sheet.

Complainant's signature

Michael Pederson, SA, DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

11.7.19City and state: Dallas, Texas
Judge's signature

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Special Agent Michael Pederson, hereafter identified as your Affiant the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

BACKGROUND

I am a Special Agent with the Department of Homeland Security (DHS) - Homeland Security Investigations (HSI) assigned to the Office of the Special Agent-in-Charge, Dallas, Texas. This complaint is based on the following facts gathered through my investigation conducted in coordination with the Fort Worth Police Department. Our investigation included the interviews of witnesses, investigative techniques such as administrative subpoenas and judicial search warrants, as well as reports or other information relayed to me by other law enforcement agencies including, but not limited to: the Fort Worth Police Department and the Irving (Texas) Police Department.

INTRODUCTION

1. I am currently assigned to the Human Trafficking and Human Smuggling Investigations Group, which is a member of the North Texas Trafficking Task Force (NTTTF). I have been a Special Agent with DHS since 2010, and I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a federal law enforcement agent since 2004. I have completed the Criminal Investigator Training Program (CITP) and ICE Special Agent Training (ICESAT) program at the Federal Law Enforcement Training Center (FLETC) in Glynco,

Georgia. I have also been trained and am responsible for conducting criminal investigations of alleged violations of federal law, with a focus on human trafficking.

2. As a criminal investigator for HSI, I have gained extensive training in the area of immigration law and human trafficking/human smuggling operations. I have been involved in the interviewing and debriefing of numerous defendants, informants, and witnesses and other persons who have personal knowledge of human trafficking and/or who have personal knowledge of the amassing, spending, converting, transporting, distributing, laundering, and/or concealing of the proceeds of human trafficking. I have testified in judicial proceedings and prosecutions for violations of laws concerning the trafficking of persons. I have also investigated or participated in investigations including but not limited to, human trafficking/smuggling, narcotics trafficking, and transnational criminal organizations (street gangs). I routinely work with other law enforcement agencies on a cooperative basis. Through these contacts, I have gained experience and knowledge in the investigation and prosecution of human traffickers and dismantling human trafficking organizations.

3. I have personally participated in this human trafficking investigation since November 2019, and I have obtained the facts set forth in this affidavit through my participation in the investigation described below by conducting interviews of witnesses, from oral and written reports of other law enforcement officers, and from records, documents and other evidence obtained during this investigation. I have also relied on additional information provided by other law enforcement organizations, including but not limited to: the Fort Worth Police Department and the Irving Police Department. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

4. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that from on or about November 4, 2019 through November 5, 2019, exact dates unknown, in the Northern District of Texas, Dallas Division, and elsewhere, **Curtis MATHIS** committed the offense of Child Sex Trafficking, 18 U.S.C. §§ 1591(a) and (b)(1)(b)(2) as related to Jane Doe 1.

PROBABLE CAUSE

1. On September 25, 2019, the Fort Worth Police Department Major Case/Missing Persons Unit received a report that a 13 year old female was missing (hereafter referred to as Jane Doe 1/JD1). Officers responded to JD1's residence and spoke with her parents. JD1's mother reported dropping her daughter off at Forest Park Middle School in Fort Worth, Texas shortly before 8 am. JD1's mother reported that shortly after returning home she was notified by the school that JD1 never arrived in class that day. A Missing Persons/Runaway report was filed for JD1 when she never returned home that day. JD1's parents provided photos of their daughter.

2. On November 4, 2019, Detectives with the Fort Worth Police Department Major Case/Human Trafficking/Missing Persons Unit observed a commercial sex advertisement posted on www.cityxguide.com. Through my training and experience, I know that CityXGuide is a website that is used primarily for the purpose of commercial sex (prostitution). In reviewing the commercial sex advertisement, Detectives observed photographs of a young female that appeared to be JD1. Detectives began texting the phone number in an effort to arrange a commercial sex transaction with the female whom Detectives believed to be JD1, in order to find

her. Through communications related to the commercial sex advertisement, officers learned JD1 was likely engaging in commercial sex acts at a hotel in Irving, Texas.

3. At approximately 2:00 pm on November 5, 2019, Detectives utilized an undercover agent to conduct a recovery/sting operation in at the Arya Inn & Suites Hotel located at 3232 West Irving Blvd, Irving, TX 75061, which is located within the Northern District of Texas (Dallas Division). Posing a commercial sex customer, the agent learned the specific room at the hotel where JD1 was engaging in commercial sex acts, Room 202. Law enforcement recovered JD1 from that room a short time later, and she was the only person in the room at the time.

4. Immediately following the recovery operation, agents met with the manager/owner of the Arya Inn & Suites, who provided a copy of the registration for Room 202. **Curtis MATHIS**, a 34 year old male, rented the room starting on November 4, 2019. Agents also observed that the registration contained a photograph of **MATHIS'** Texas Driver's License.

5. At that point, agents began reviewing the hotel video surveillance recordings in an effort to determine how JD1 arrived at the Arya Inn & Suites, and the events leading to her recovery. In reviewing the surveillance video, agents observed that JD1 arrived on November 4, 2019 at approximately 5:30 pm with a black male, whom agents immediately observed matched the photograph on **MATHIS'** driver's license. Agents further observed **MATHIS** rent the hotel room while JD1 sat at a small table located in the lobby area as shown in the following screen capture:



6. Agents further observed that after **MATHIS** rented the hotel room, **MATHIS** and JD1 travelled to the second floor of the hotel and entered room 201. In speaking with the manager/owner as to why JD1 was located in room 202 at the time she was recovered and not in room 201, the manager advised that **MATHIS** returned to the lobby shortly after going upstairs and stated that room 201 was too small. The manager advised that **MATHIS** was then given the key to room 202 and relocated to that room. The video surveillance confirmed the manager's description as to how JD1 ended up in room 202:



7. In addition, agents observed what I recognize, through my training and experience, to be several commercial sex clients meeting with JD1 for the purpose of commercial sex acts. Agents observed that on November 4, 2019 at approximately 2230 hours, JD1 left the room briefly and returned with a black male as shown in the screen capture below that was taken from the surveillance video. I also observed that the black male left JD1's hotel room at approximately 2250 hours, twenty minutes later. Through my training and experience, I know that a timeframe of 15-20 minutes is typically referred to as a "quick visit" in the commercial sex realm. I also observed that the black male depicted in the below screen capture did not return to JD1's room at any point leading up to her recovery.



8. I further observed that on November 5, 2019 at approximately 1108 hours, another commercial sex customer arrived at JD1's room for a commercial sex date. I observed the white male depicted in the screen capture below knock on the door, enter the room and stay until approximately 1112 hours. I observed that shortly after the white male depicted in the above photograph departed, **MATHIS** returned to JD1's room (depicted below).



9. Through my training and experience, I know that pimps will commonly return to the room following a commercial sex date in order to collect the money that the client paid for the commercial sex act. In this case, I observed Mathis return to Room 202 approximately 37 minutes after the white male departed.



10. I also observed that **MATHIS** stayed inside of JD1's room for approximately 3 minutes before leaving again. As **MATHIS** was leaving, he placed what appeared to be money in what appeared to be a wallet (as shown in the below screen capture).



11. In addition, I observed that on November 5, 2019 at approximately 1235 Hours another commercial sex client arrived at JD1's room as depicted in the below screen capture. I observed a Hispanic male knock on JD1's door and enter the room. He remained inside of JD1's room until approximately 1242 before departing. Through my training and experience, I know that this was likely another "quick visit" commercial sex date.



12. As described above, law enforcement rescued JD1 at approximately 1400 hours on November 5, 2019 from room 202, the same room depicted in the photos above. At the time of her recovery, I observed that JD1 was dressed only in a large hooded sweatshirt with a zipper.

JD1 was not wearing undergarments which through my training and experience leads me to believe that JD1 was meeting with the undercover agent expecting to engage in a commercial sex act.

13. Once JD1 was recovered, Detectives with the Fort Worth Police Department's Major Case/Human Trafficking Unit obtained and executed a search warrant for room 202. Detectives recovered numerous items of evidence that are indicative of commercial sex trafficking, including: condoms (both used and unused), lubricants, baby wipes, lingerie and medications to treat urinary tract infections and sexually transmitted infections. Detectives also seized several hundred dollars in cash, hidden in a dresser drawer, in denominations consistent with what I frequently encounter in commercial sex trafficking investigations.

14. At the time of her recovery, JD1 was in possession of an Apple iPhone. As Detectives were executing the search warrant on room 202, I observed that JD1's iPhone continued to receive numerous text messages from commercial sex customers seeking dates and requesting the prices for commercial sex acts. These messages were visible on the exterior screen of the phone as they came in and did not require accessing the phone in order to view their content. I further observed several text messages from someone saved in JD1's cellphone as "Monkey". In these text messages I observed that "Monkey" asked JD1 if she was continuing to "hit licks" and "make dat money," which through my training and experience, I know to be a term used to describe commercial sex dates.

15. When JD1 was recovered, she was wearing no makeup. She is very petite, and her mannerism are consistent with that of a child. Mathis was observed in her presence during at least a two day period. Based on these facts, I believe probable cause exists that he either knew,

should have known, and/or had a reasonable opportunity to observe JD1 was under the age of 18. In addition, Mathis used facilities of interstate commerce to facilitate her commercial sex acts, namely cellular phones, the internet and/or hotels.

16. Law enforcement briefly spoke with JD1, who indicated that she feared for her safety because her traffickers said they would shoot and kill her if she cooperated. She further indicated that there were several people involved in trafficking her over an extended period of time. Law enforcement is working on identifying others involved. An additional interview will occur in short course, once she is stabilized.

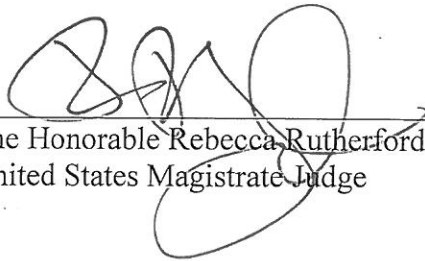
CONCLUSION

17. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning on or about November 4, 2019 (exact date unknown) to on or about November 5, 2019, within the Dallas Division of the Northern District of Texas and elsewhere – **Curtis MATHIS** committed the offense of Child Sex Trafficking, a violation of 18 U.S.C. §§ 1591(a) and (b)(1)(b)(2) as related to Jane Doe 1.



Michael Pederson
Special Agent
Department of Homeland Security
Homeland Security Investigations

Subscribed and sworn before me this 1 day of November 2019 at _____ hours in Dallas,
Texas.



The Honorable Rebecca Rutherford
United States Magistrate Judge